

**EXHIBIT 1 TO PLAINTIFFS' RULE 37(C) MOTION:
TABLE OF PLAINTIFFS'S INTERROGATORIES
IDENTIFYING DESIGNATED MATTERS ON WHICH DEFENDANTS
ARE TO BE PROHIBITED FROM INTRODUCING NEW EVIDENCE**

Number	Interrogatory
No. 1 to CCS; No. 1 to BCC	If you deny or object to one or more of the above requests for admission in whole or in part, please identify the basis for your denial or objection, as well as the principal and material evidence and records on which you rely to support each denial or objection. (RFA Nos. 1-7.)
No.2 to CCS	Please identify the standards, guidelines, and other documents issued by the National Commission on Correctional Health Care (NCCHC) that were required or utilized under your Medical Services Agreement with the Board during the calendar year 2016.
No. 3 to CCS	Please identify the standards, guidelines, and other documents issued by the American Correctional Association (ACA) that were required or utilized under your Medical Services Agreement with the Board during the calendar year 2016.
No. 3 to BCC	Please state whether the Metropolitan Detention Center was on "lockdown" at any time between 12:01 a.m. on October 16, 2016, and 11:59 p.m. on October 17, 2016, and for each instance in which the facility was on lockdown during that period, please identify the reasons for the lockdown, the person(s) who gave the order(s) to put the facility on lockdown, the restrictions imposed during the lockdown, the portions of the facility affected by the lockdown, and the principal and material records which document the lockdown.
No. 5 to CCS; No. 4 to BCC	Please identify the principal and material facts and records on which you rely to support each of the affirmative defenses pleaded in your Answer to Plaintiff's Complaint (Doc. 1).
No. 6 to CCS; No. 5 to BCC	Please identify by name, job title or position, business mailing address, business e-mail address, and business telephone number the principal and material employees, agents, consultants, or contractors of Correct Care Solutions, LLC, other than your attorneys, who were involved in preparing, proposing, reviewing, negotiating, approving, or amending CCS's Medical Services Agreement with the County, and for each such person, please describe the specific functions he or she performed with respect to that document, as well as the date(s) and time(s) of such performance during the calendar years 2014, 2015, and 2016.

Number

	Interrogatory
No. 6 to BCC	Please identify by name, job title or position, business mailing address, business e-mail address, and business telephone number your principal and material employees who interacted with Plaintiff Shawna Tanner during her incarceration at the Metropolitan Detention Center from 12:01 a.m. on Sunday, October 16, 2016, until 11:59 p.m. on Monday, October 17, 2016, and for each such employee, please describe the specific interaction(s) he or she had with Ms. Tanner during that period, as well as the date(s) and time(s) of each such interaction. For purposes of this interrogatory, the words “interact” or “interaction” include the acts of communicating, commanding, directing, advising, escorting, contacting, moving, recording, assisting, and providing supplies or services.
No. 7 to BCC	Please identify by date and times the shifts or other work periods when the following employees were on duty at the Metropolitan Detention Center between October 4, 2016, and October 20, 2016, as well as the posts or duty stations to which they were each assigned during each shift or work period when they were on duty between those dates: Toni Fastenau, Claudia Rodriguez-Nunez, Rebecca Macias, Martina Sanchez-Filfred, and Tina M. Munoz.
No. 7 to CCS	Please identify by name, job title or position, business mailing address, business e-mail address, and business telephone number the principal and material employees, agents, consultants, or contractors of Correct Care Solutions, LLC who were involved in providing health care to Plaintiff Shawna Tanner and responding to requests for health care by or on behalf of Plaintiff Shawna Tanner during her incarceration at the Metropolitan Detention Center from October 4, 2016, until she was released on October 20, 2016, and for each such person, please describe the specific functions he or she performed with respect to Ms. Tanner during that period, as well as the date(s) and time(s) of such performance.
No. 8 to CCS	Please identify the date, individual’s name, job title or position, and duty station or post involved for each instance in which an individual ended their employment with you or otherwise stopped working for you at the Metropolitan Detention Center between June 1, 2016, and November 30, 2016.
No. 9 to CCS	Please identify the date, individual’s name, job title or position, and duty station or post involved for each instance in which an individual began their employment with you or otherwise started working for you at the Metropolitan Detention Center between June 1, 2016, and November 30, 2016.
No. 10 to CCS; No. 8 to BCC	Please identify by name, job title or position, current business mailing address, current business e-mail address, and current business telephone number all persons, other than your attorneys, who prepared or otherwise contributed to each answer or response to Plaintiffs’ First Set of Requests for Admission, Interrogatories, and Requests for Production.

Number

	Interrogatory
No. 9 to BCC	Please identify by name, current business mailing address, current business e-mail address, and current business telephone number all individuals whom you employed as a contract compliance officer at the Metropolitan Detention Center from December 9, 2014, to the present, and for each such person, please identify the dates of their employment and a description of their principal and material job duties. If the position was vacant for any time during this period, please identify the dates when the position was vacant.
No. 11 to CCS	Please identify by name, current business mailing address, current business e-mail address, and current business telephone number all individuals whom you employed as the Health Services Administrator or Health Administrator at the Metropolitan Detention Center from December 9, 2014, to the present, and for each such person, please identify the dates of their employment and a description of their principal and material job duties. If the position was vacant for any time during this period, please identify the dates when the position was vacant.
No. 12 to CCS; No. 11 to BCC	Please state to the best of your knowledge whether any pregnant inmate other than Plaintiff Shawna Tanner died, delivered a stillborn baby, miscarried, or otherwise lost the life of her fetus at the Metropolitan Detention Center during the calendar years 2015 through 2016, and if the answer is yes, please identify the date of that occurrence, the type of loss of life involved (mother's death, stillbirth, miscarriage, or other loss), and the records which document it. If you contend that those records are privileged or otherwise protected from disclosure, please state the grounds for that contention.
No. 12 to BCC; No. 13 to BCC	If you deny or object to one or more of the above requests for admission in whole or in part, please identify the basis for your denial or objection, as well as the principal and material evidence and records on which you rely to support each denial or objection. (RFA's 8 to 12 to BCC) (RFA's 13-19 to BCC)
No. 17 to BCC	Please identify each Bernalillo County employee who was assigned the duties of meeting accreditation personnel from the National Commission on Correctional Health Care (NCCHC) or otherwise facilitating the review of the Metropolitan Detention Center (MDC) which those accreditation personnel conducted in February 2018.
No. 13 to CCS	If you deny or object to one or more of the above requests for admission in whole or in part, please identify the basis for your denial or objection, as well as the principal and material evidence and records on which you rely to support each denial or objection. (RFA's 8 to 23 to CCS).
No. 14 to CCS	Please identify each individual who held the position or was assigned the duties of Director of Nursing at the Metropolitan Detention Center (MDC) during the calendar years 2015 and 2016, and for each such individual, please identify the starting and ending date of his or her assignment or employment in that position.

Number

	Interrogatory
No. 15 to CCS	Please identify each individual who held the position or was assigned the duties of Charge Nurse at the Metropolitan Detention Center (MDC) on a full-time or weekly basis during the calendar years 2015 and 2016, and for each such individual, please identify the starting and ending date of his or her assignment or employment in that position.
No. 16 to CCS	Please identify each individual who was assigned the duties of performing annual skills testing for registered nurses at the Metropolitan Detention Center (MDC) during the calendar years 2015 and 2016, and for each such individual, please identify the starting and ending date of his or her assignment or employment in that position.
No. 17 to CCS	Please identify each individual who was assigned the duties of performing annual performance reviews for registered nurses at the Metropolitan Detention Center (MDC) during the calendar years 2015 and 2016, and for each such individual, please identify the starting and ending date of his or her assignment or employment in that position.
No. 18 to CCS	Please identify each individual who was assigned the duties of ensuring that annual skills testing and performance reviews for registered nurses at the Metropolitan Detention Center (MDC) were in compliance with National Commission on Correctional Health Care (NCCHC) Standards during the calendar years 2015 and 2016, and for each such individual, please identify the starting and ending date of his or her assignment or employment in that position.
No. 19 to CCS	Please identify each individual who was assigned the duties of showing or facilitating review of records of annuals skills testing and annual performance review records for registered nurses for the calendar years 2015 and 2016 to accreditation personnel from the National Commission on Correctional Health Care (NCCHC) Standards when conducted their review of the Metropolitan Detention Center (MDC) in February 2018.